

JAN 12 1989

Odwach

HW-112

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

John Lavillette  
Plant Industrial Engineer  
Earle M. Jorgensen Co.  
8531 East Marginal Way South  
Seattle, Washington 98108

Re: Notice of Violation and Warning

Dear Mr. Lavillette:

USEPA RCRA



3014030

This Notice of Violation and Warning (hereinafter "Notice") is being issued to your facility based on findings from an inspection conducted on June 1, 1988, by a representative of the United States Environmental Protection Agency (EPA). The inspection was performed to determine compliance with hazardous waste management regulations adopted by the EPA under the Resource Conservation and Recovery Act (RCRA). At the time of this inspection, the facility was not in compliance with the following RCRA requirements:

1. The facility did not provide notification of treatment standards to the designated treatment or storage facility for each shipment of waste regulated by the Land Disposal Restrictions. Specifically, the facility did not provide notification of treatment standards to the designated treatment facility for two manifested shipments of waste acid (Uniform Hazardous Waste Manifest Nos. 04037 and 04068). This is a violation of 40 CFR 268.7(a)(1).
2. The facility has not demonstrated whether the waste oil and sludge generated is hazardous or nonhazardous. Specifically, the facility has not determined if the waste generated in the recycling system for machine and lubricating oils is a hazardous waste, as identified in Subpart C of 40 CFR 261, by either testing or applying knowledge of hazardous characteristic of the waste in light of the materials or the processes used. This is a violation of 40 CFR 262.11(c).

Violation of RCRA or regulations promulgated thereunder are subject to administrative civil penalties under §3008 of RCRA [42 U.S.C. §6928]. Please advise this office in writing of the corrective measures you will take or have taken regarding the violations noted above. Your response must outline measures taken to prevent these violations from recurring. Such measures must include implementation of a program for the identification and management of any generated hazardous waste.



This written response is due within (30) days of receipt of this letter and should be addressed to Michael F. Gearheard, Chief, Waste Management Branch, at the above address. Failure to submit the request information within the time period specified may subject your company to additional enforcement action under §3008 of RCRA [42 U.S.C. §6928], including the assessment of civil penalties.

If you have any questions regarding these actions, you may contact Al Odmark at (206) 442-1886.

Sincerely,

/s/ Charles E. Findley

Charles E. Findley, Director  
Hazardous Waste Division

cc: Julie Sellick, Ecology

bcc: Jack Boller WOO  
Bill Adams HWD  
Chuck Rice HWD  
Al Odmark HWD

A.ODMARK:77636:13-5-89:1r



*MB RCE*  
*AIO.*

**EARLE M. JORGENSEN CO.**  
**STEEL**

FORGE DIVISION

SEATTLE, WASHINGTON 98124

PHONE (206) 762-1100

TELEX 32-0080

MAILING ADDRESS: BOX 24026

January 30, 1989

Mr Michael F Gearheard  
Chief, Waste Management Branch  
WAD000602813  
HW-112  
US Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
Seattle, Washington 98101

Dear Mr Gearheard:

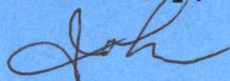
This letter responds to Certified Mail-Notice of Violation and Warning received January 18, 1989.

Attached are two Uniform Hazardous Waste Manifests (number 04037 and 04068) listing treatment standards in section K. This was discussed over the telephone with Mr Al Odmark with the understanding that the information listed in section K was adequate notification of treatment standards to the TSD.

Also attached are two lab reports listing the results of tests taken of waste solvent oil and accumulated sludge on January 22, 1987 but not attached to the company records reviewed by the inspectors during the June 1, 1988 inspection of this facility. Corrective action has been taken to ensure test results are properly attached to appropriate company records and available for review.

If further explanation is required or you have any questions please contact me.

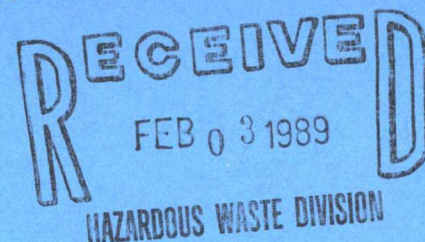
Sincerely,



Plant Industrial Engineer

JLaVillette:sjd

Enclosures (4)





<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. WAD000602813	Manifest Document No. 04037		2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
		3. Generator's Name and Mailing Address Earle M. Jorgensen Co. 8531 E. Marginal Way S., Seattle, WA 98108		A. State Manifest Document Number		B. State Generator's ID	
4. Generator's Phone (206) 762-1100		6. US EPA ID Number WAD 058367152		C. State Transporter's ID		D. Transporter's Phone (206) 622-1090	
5. Transporter 1 Company Name Northwest EnviroService Inc.		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
7. Transporter 2 Company Name		10. US EPA ID Number WAD 058367152		G. State Facility's ID		H. Facility's Phone (206) 622-1090	
9. Designated Facility Name and Site Address Northwest EnviroService Inc. 1500 Airport Way South Seattle, WA 98134		12. Containers		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		No.	Type				
a. <u>HM</u> RQ Waste Acid Liquid, NOS Corrosive Material NA 1760 (D007, Sulfuric Acid)		1	TT	1200	G	D002 D0 D008 W1	
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above a. Hydrochloric Acid, Sulfuric Acid and water - WPQ 10644				K. Handling Codes for Wastes Listed Above R1, S0, T1, T23, T24, T31, T40, T41			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name HARRY HALLIBURTON		Signature <i>Harry Halliburton</i>		Month Day Year 12/14/87			
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Alvin Mason</i>		Month Day Year 12/14/87			
Printed/Typed Name ALVIN MASON		Signature		Month Day Year			
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year			
Printed/Typed Name		Signature		Month Day Year			
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name Patrick Weaver		Signature <i>Patrick Weaver</i>		Month Day Year 12/14/87			



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. WAD 000602813		Manifest Document No. 04068		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
		3. Generator's Name and Mailing Address Earle M. Jorgensen Co. 8531 E. Marginal Way S., Seattle, WA 98108						A. State Manifest Document Number		
4. Generator's Phone (206) 762-1100						B. State Generator's ID				
5. Transporter 1 Company Name Northwest EnviroService Inc.				6. US EPA ID Number WAD058367152		C. State Transporter's ID		D. Transporter's Phone (206) 622-1090		
7. Transporter 2 Company Name				8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone		
9. Designated Facility Name and Site Address Northwest EnviroService Inc. 1500 Airport Way South Seattle, WA 98134				10. US EPA ID Number WAD058367152		G. State Facility's ID		H. Facility's Phone (206) 622-1090		
GENERATOR	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)			12. Containers		13. Total Quantity		14. Unit Wt/Vol		
				No. Type						
	a. RQ Waste Acid Liquid, NOC Corrosive Material NA1760 (EPA EP Toxicity)			1 1T		1200		G		
	b.									
	c.									
d.										
J. Additional Descriptions for Materials Listed Above a. hydrochloric acid, sulfuric acid, water and sludge WPQ 10644						K. Handling Codes for Wastes Listed Above a) 502T, T23, T24, T31, T40, T				
15. Special Handling Instructions and Additional Information										
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										
TRANSPORTER	Printed/Typed Name HARRY HALLIBURTON				Signature <i>Harry Halliburton</i>				Month Day Year 12/15/87	
	17. Transporter 1 Acknowledgement of Receipt of Materials									
	Printed/Typed Name ALVIN MASON				Signature <i>Alvin Mason</i>				Month Day Year 12/15/87	
	18. Transporter 2 Acknowledgement of Receipt of Materials									
FACILITY	Printed/Typed Name 11				Signature				Month Day Year	
	19. Discrepancy Indication Space None Add (Doc2)									
	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name Patrick Weaver				Signature <i>Patrick Weaver</i>				Month Day Year 12/15/87		





**Northwest  
EnviroService  
Inc.**

**LAB REPORT**

DATE: 1/22/87  
SAMPLE #: 870122-B

GENERATOR NAME: JORGENSEN STEEL GENERATOR SAMPLE #: 2

ADDRESS: \_\_\_\_\_ WPQ #: \_\_\_\_\_

MANIFEST #: \_\_\_\_\_

GENERATOR CONTACT: HL MORAN

NWES CONTACT: TORY

PROJECTED WASTE VOLUME: \_\_\_\_\_ DRUMS \_\_\_\_\_ BULK \_\_\_\_\_ VOLUME \_\_\_\_\_ GALLONS \_\_\_\_\_

Waste Product Name

USED SOLVENT & OIL

Process Generating Waste

SOLVENT TANK TOP SAMPLE

<b>Physical State At 70°F.</b> <input type="checkbox"/> Solid <input type="checkbox"/> Sludge <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Powder		<b>Free Liquids at 70°F.</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Volume <u>100%</u>		<b>Flash Point</b> <input type="checkbox"/> < 70°F. <input type="checkbox"/> ≥ 140°F. <input checked="" type="checkbox"/> 70°F. - 100°F. <input type="checkbox"/> No Flash <input type="checkbox"/> 101°F. - 139°F. <input type="checkbox"/> Exact		<b>Layers</b> <input type="checkbox"/> Multilayered <input type="checkbox"/> Bi-Layered <input checked="" type="checkbox"/> Homogenous	
<b>pH</b> <input type="checkbox"/> < 2 <input type="checkbox"/> 10.1 - 12 <input type="checkbox"/> 2 - 4 <input type="checkbox"/> > 12 <input type="checkbox"/> 4.1 - 10 <input checked="" type="checkbox"/> Exact <u>NA</u>		<b>Solids</b> <input type="checkbox"/> By Volume Total <u>NA</u> % Dissolved % Suspended %		<b>Density (Sp. G.)</b> <input type="checkbox"/> Liquid lbs./gal. <input type="checkbox"/> Solid lbs./ft. <sup>3</sup>		<b>Odor</b> <input type="checkbox"/> None <input type="checkbox"/> Strong <input checked="" type="checkbox"/> Mild Describe <u>solvent</u>	
						<u>lt brown</u>	

**METALS**

**WASTE PRODUCT CHEMICAL COMPOSITION (Account For 100% of Total)**

<input type="checkbox"/> Total (PPM) <input type="checkbox"/> EPA Extraction Procedure (mg/L)		<b>Other (Specify):</b>	
Arsenic (As) .....	Mercury (Hg) .....	H <sub>2</sub> O .....	% .....
Barium (Ba) .....	Nickel (Ni) .....	HCl .....	% .....
Cadmium (Cd) .....	Selenium (Se) .....	H <sub>2</sub> SO <sub>4</sub> .....	% .....
Chromium (Cr) .....	Silver (Ag) .....	HNO <sub>3</sub> .....	% .....
Copper (Cu) .....	Zinc (Zn) .....	NaOH .....	% .....
Lead (Pb) .....	Nondetectable .....	Phenols .....	% .....
<b>REACTIVES AND OTHER WASTES (PPM)</b>		Chlorides .....	% .....
Amines .....	PCB S <u>42</u>		
Cyanides .....	Other's .....		
Sulfides .....			

**ADDITIONAL TESTS**

TEST	CONCENTRATION	TEST	CONCENTRATION
chlorinated solvents	< 0.1 ppm		
listed wastes (F-series)	"		

COMMENTS: No chlorinated solvents or other listed wastes detected above 0.1 parts-per-million

ANALYSIS PERFORMED BY: KD



**Northwest  
EnviroService  
Inc.**

**LAB REPORT**

DATE: 1/22/87  
SAMPLE #: 870122-A

GENERATOR NAME: JORGENSEN STEEL GENERATOR SAMPLE #: #1  
ADDRESS: \_\_\_\_\_ WPO #: \_\_\_\_\_  
MANIFEST #: \_\_\_\_\_  
GENERATOR CONTACT: HL MORAN  
NWES CONTACT: TORY  
PROJECTED WASTE VOLUME: \_\_\_\_\_ DRUMS \_\_\_\_\_ BULK \_\_\_\_\_ VOLUME \_\_\_\_\_ GALLONS \_\_\_\_\_

Waste Product Name

BOTTOM SAMPLE SOLVENT & SLUDGE

Process Generating Waste

SOLVENT TANK

<b>Physical State At 70°F.</b> <input type="checkbox"/> Solid <input type="checkbox"/> Sludge <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Powder		<b>Free Liquids at 70°F.</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Volume <u>90%</u>		<b>Flash Point</b> <input type="checkbox"/> < 70°F. <input type="checkbox"/> ≥ 140°F. <input type="checkbox"/> 70°F. - 100°F. <input type="checkbox"/> No Flash <input type="checkbox"/> 101°F. - 139°F. <input checked="" type="checkbox"/> Exact <u>&gt; 200°F</u>		<b>Layers</b> <input type="checkbox"/> Multilayered <input checked="" type="checkbox"/> 2-Layered <input type="checkbox"/> Homogenous	
<b>pH</b> <input type="checkbox"/> < 2 <input type="checkbox"/> 10.1 - 12 <input type="checkbox"/> 2 - 4 <input type="checkbox"/> > 12 <input type="checkbox"/> 4.1 - 10 <input checked="" type="checkbox"/> Exact <u>N/A</u>		<b>Solids</b> <input checked="" type="checkbox"/> By Volume Total <u>10%</u> % Dissolved % Suspended %		<b>Density (Sp. G.)</b> <u>1.012</u> <input type="checkbox"/> Liquid lbs./gal. <input type="checkbox"/> Solid lbs./ft. <sup>3</sup>		<b>Color</b> <input type="checkbox"/> None <input type="checkbox"/> Strong <input checked="" type="checkbox"/> Mild Describe <u>solvent</u>	

METALS		WASTE PRODUCT CHEMICAL COMPOSITION (Account For 100% of Total)	
<input type="checkbox"/> Total (PPM)	<input type="checkbox"/> EPA Extraction Procedure (mg/L)	<u>Other (Specify):</u>	
Arsenic (As) .....	Mercury (Hg) .....	H <sub>2</sub> O .....	%
Barium (Ba) .....	Nickel (Ni) .....	HCl .....	%
Cadmium (Cd) .....	Selenium (Se) .....	H <sub>2</sub> SO <sub>4</sub> .....	%
Chromium (Cr) .....	Silver (Ag) .....	HNO <sub>3</sub> .....	%
Copper (Cu) .....	Zinc (Zn) .....	NaOH .....	%
Lead (Pb) .....	Nondetectable .....	Phenols .....	%
<b>REACTIVES AND OTHER WASTES (PPM)</b>		Chlorides .....	%
Amines .....	PCB S <u>12</u>		
Cyanides .....	Other's .....		
Sulfides .....			

**ADDITIONAL TESTS**

TEST	CONCENTRATION	TEST	CONCENTRATION
<u>chrominated solvents</u>	<u>&lt; 0.1 ppm</u>		
<u>nitro (nitrates) (F series)</u>	<u>&lt; 0.1 ppm</u>		

COMMENTS: \* no chrominated solvents or other listed wastes detected above  
or 0.1 parts-per-million  
ANALYSIS PERFORMED BY: HL



Odmark

● **SENDER:** Complete Items 1 and 2 when additional services are desired, and complete Items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery  
↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to:  
 John Levillette  
 Plant Industrial Engineer  
 Earle M. Jorgensen Co.  
 8531 East Marginal Way South  
 Seattle, WA 98108  
 N.O.V. - AO

4. Article Number  
 P-563 139 322

Type of Service:  
☐ Registered ☐ Insured  
☒ Certified ☐ COD  
☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee  
 X

6. Signature - Agent  
 X

7. Date of Delivery  
 JAN 18 1989

8. Addressee's Address (ONLY if requested and fee paid)

